



11-10-82

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 10 1982

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: EPA File No. 1812-EAI. "Me-too"
registration of technical chlorothalonil.

From: Richard Loranger, Chemist
Residue Chemistry Branch *R. Loranger*
Hazard Evaluation Division (TS-769)

Thru: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769) *CT*

To: Henry Jacoby, P.M. No. 21
Herbicide-Fungicide Branch
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

Griffin Corporation has submitted a revised statement of formula and hexachlorobenzene (HCB) analyses for technical chlorothalonil (tetrachloroisophthalonitrile) as requested in our previous review (R. Loranger, 7/15/82).

[REDACTED]

With the new statement of formula we can now compare the composition of the new technical with Diamond Shamrock's registered material (see correspondence file of PP# 1E2473). The impurity levels represent maximum values.

QUALITY CONTROL PROCEDURE INFORMATION IS NOT INCLUDED
IMPURITY INFO NOT INCLUDED

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<u>Ingredients</u>	<u>Griffin</u>	<u>% by weight</u> <u>D. Shamrock</u>
tetrachloroisophthalonitrile	98.0 (min)	96.0 (min)

*total amount of tetrachlorophthalonitrile isomers

We conclude that these technicals are not identical due to the greater purity of Griffin's material and the presence of [REDACTED] in Diamond Shamrock's technical. We defer to TOX for an incremental risk assessment regarding these differences and for their concern over the presence of up to [REDACTED] HCB in Griffin's chlorothalonil.

Conclusions and Recommendation

1. Griffin's technical chlorothalonil is not identical to the registered Diamond Shamrock product due to the former's greater purity (and thus lower impurity levels) and the presence of [REDACTED] in the latter.
2. Griffin's chlorothalonil contains [REDACTED] hexachlorobenzene (HCB).

We defer to TOX for an incremental risk assessment concerning the differences between these products and for their concern over the presence of up to [REDACTED] HCB, an impurity which could present a residue problem, in Griffin's technical chlorothalonil.

TS-769:RCB:R. Loranger:mch:CM#2:RM810:X77377
cc: R.F., Circu., R. Loranger, Daconil S.F.
RDI: R. Hummel, 11/8/82; R. Schmitt, 11/8/82

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